

**g. O'Connor & Hannan Curtails Its Lobbying of the
White House Prior to the Decision on July 14, 1995**

Patrick O'Connor's push for White House action on the Hudson matter, including his push for a meeting with Harold Ickes, subsided in June 1995. As late as June 6, O'Connor's daytimer and billing records reflect that he was calling David Mercer concerning the Hudson application and the status of efforts to arrange a meeting with Ickes. After June 6 (the date of the David Meyers memo), such notations cease, and the forms and frequency of O'Connor's billing entries shifts considerably. On June 12, O'Connor recorded time for getting an update from Corcoran regarding "new White House developments." Neither O'Connor nor Corcoran could recall what those developments were.

During the time period from June 12 until the July 14 decision, O'Connor & Hannan's lobbying efforts with respect to the White House (and, indeed, with respect to Hudson generally) dropped off precipitously. O'Connor's only time entry during that entire interval was a June 19 entry concerning an update from Kitto about developments involving local and federal legislators, as well as a "discussion regarding support to be given to Committee to Re-Elect and D.N.C."³⁴² Nonetheless, there is no direct evidence that the opponents or their representatives

³⁴¹(...continued)
have informed Interior that she was making the inquiry on behalf of a contributor. While O'Connor testified that she made no such comments in her communications with Interior, Ickes's view of permissible conduct in this regard certainly seems at odds with the presumptive purpose of the White House contacts policies – avoiding even the appearance of impropriety in agency decision-making – as well as Ickes's own stated belief that "even if something is not illegal in a strict sense, actions can be taken, it seems to me, that do undermine the confidence of the public in the decisionmaking process." Ickes G.J. Test. at 253.

³⁴²O'Connor also recorded notations in his daytimer on June 19, which were not captioned for billing, reading:

(continued...)